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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELIZABETH WILLIS,

Plaintiff,

vs.

TRANSUNION, LLC, EQUIFAX
INFORMATION SERVICES, LLC, BERLIN-
WHEELER, INC.,

Defendants.

Case No.: 2:22-cv-00609-RFB-DJA

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF’S COMPLAINT (SECOND
REQUEST)**

Plaintiff, Elizabeth Willis (“Plaintiff”), and Defendant, Berlin-Wheeler, Inc. (“Defendant”) (collectively “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

On April 11, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with Plaintiff’s Complaint on April 18, 2022. The deadline for Defendant to respond to Plaintiff’s Complaint was May 9, 2022. After a joint motion of the parties, this Court extended the deadline to May 23, 2022 [ECF No. 13]. The Parties have discussed extending the deadline for Defendant to respond to Plaintiff’s Complaint to allow for further ongoing discussions of possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to file their responsive pleading to Plaintiff’s Complaint to June 13, 2022.

This is the second motion for an extension of time for Defendant to file their responsive

pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that occurs during the pendency of this extension.

DATED this 23rd day of May, 2022.

WRIGHT, FINLAY & ZAK, LLP

CONTEMPORARY LEGAL SOLUTIONS

/s/ Ramir M. Hernandez

/s/ Robert M. Tzall

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Inc.

Attorneys for Plaintiff, Elizabeth Willis

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 24, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (SECOND REQUEST)** on the 23rd day of May, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP